

SHER TREMONTÉ LLP

November 26, 2018

BY ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Brayan Jiménez*, 15 Crim. 252 (PKC)

Dear Judge Chen:

We write on behalf of our client, Brayan Jiménez, to respectfully request a temporary modification of Mr. Jiménez's travel restrictions that would permit him to travel to Orlando, Florida as early as Monday, November 26 and return to Miami on Thursday, November 29, 2018, and to stay out past his curfew for two hours (from 10:00 p.m. until midnight) on the nights of November 26, 27, and 28.

Mr. Jiménez is currently out on a \$1,500,000 bond secured by property. The bond restricts Mr. Jiménez's travel to the Southern District of Florida. Some of Mr. Jiménez's family members who live in Guatemala, including his grandchildren, are visiting Miami and Orlando this coming week and Mr. Jiménez wishes to join them. If permitted to travel to Orlando, Mr. Jiménez would travel by bus and would stay with his family at 8971 Stringer Dr., Davenport, FL 33896.

I apologize for the short notice. Mr. Jiménez's family had airplane tickets that had been purchased in connection with a canceled court appearance, and so had to use these tickets within a limited amount of time. Accordingly, the travel arrangements were made at the last minute. As the Court may know, Mr. Jiménez lives alone in Miami, and has contact with his family only when they are able to travel to Florida. I have advised Pre-Trial Services and the government of our request, and Pre-Trial Services informed us they do not object, and the government informed us it defers to Pre-Trial.

I appreciate the Court's consideration.

Respectfully submitted,

/s/
Justine A. Harris

cc: All counsel of record (by ECF)
U.S. Pre-Trial Services Officers Jeanine Quijije and Anna Lee (by email)